



CALIFORNIA RESOURCES ELK HILLS, LLC

900 Old River Road, Bakersfield CA 93311

2019 APR 18 AM 9:53

April 10, 2019

Dr. Karl Longley, Chair
Mr. Patrick Pulupa, Executive Office
Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Dr #200
Rancho Cordova, CA 95670-6114

RECEIVED

APR 22 2019

RWQCB-CVR
FRESNO, CALIF.

Re: Tentative Cease and Desist Order for the Valley Water McKittrick Facility

Dear Dr. Longley and Mr. Pulupa:

On behalf of the California Resources Corporation (CRC), we send this letter asking that the Regional Water Quality Control Board for the Central Valley (Regional Board) reconsider the proposed action for its June 2019 meeting to adopt a Cease and Desist Order (CDO) for the Valley Water Management Company's McKittrick facility in Kern County. As you both know, CRC, as a company, has been and continues to be an active participant in CV-SALTS and the Central Valley Salinity Coalition, as well as participating in the CV-SALTS program as a member of Valley Water and CIPA.

CRC's participation in CV-SALTS has been based on the promise of future regulatory flexibility related to salinity discharges. This CDO does not appear to be issued in that vein.

Issuing a CDO requiring compliance with permit conditions of a yet to be issued new permit within just over a year from the proposed issuance of the CDO appears to be contrary to the goals and spirit of CV-SALTS' long term salinity management plan and goals, and makes active CV-SALTS participants such as CRC question whether the time and money we spend in meetings and working on Basin Plan amendments has been, or will in the future be, worthwhile.

CRC as a member of Valley Water would like to express our concern on the issuance of this CDO and the effect it may have on the overall viability of the CV-SALTS program.

Should you have any questions please do not hesitate to call me at (661) 332-0343 or Rick Garcia at (661) 303-7878. Thank you for considering our comments.


James Robinson
Vice President HSE
California Resources Corporation